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DEPARTMENT OF FISH AND GAME

OFFICE OF THE COMMISSIONER

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MAR 22 2000

March 17, 2000

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Dear General Griffin, Mr. Stelle, Ms. Johansen, and Ms. Badgley:

RE: Comments on the All-H Paper

The Alaska Department of Fish and Game (ADF&G) appreciates the opportunity to comment on the "Draft, Conservation of Columbia Basin Fish - Building a Conceptual Recovery Plan, (All-H Paper)." ADF&G, also, thanks the federal agencies for putting alternatives on the table for public discussion and for listening to the comments of Alaskans at the four hearings held in Southeast Alaska. The agencies' coordinated approach and regional review strategy has been useful.

1 The Alaska Department of Fish and Game, however, finds the All-H Paper somewhat confusing and difficult to comment upon. Part of the confusion stems from the lack of clarity on the legal status of this document that is described as a "draft conceptual recovery plan." We do not understand the document to be a proposed recovery plan under Section 4 of the Endangered Species Act. It is unclear if the document is intended to gather information to be used for recovery planning, to inform decision-making related to the FCRPS biological opinion, or for some other purpose. The federal agencies should clarify exactly what role this document plays in the recovery of Snake and Columbia River salmon. The federal government also needs to develop recovery goals through a recovery plan for the listed fish stocks.

Furthermore, the biological and ecological effects of the options and alternatives are described in such a general manner as to prevent thorough analysis and comment. The federal agencies should provide more specifics about the biological feasibility of the options and alternatives. Adding to the general confusion is the integrated alternatives that do not have an expectation of accomplishing the basic biologic goal of recovery for listed Snake River salmon and steelhead.

If this document is going to be made final, ADF&G believes that federal agencies should present the biological evaluation and ecological effects of each option/alternative using the best science available. If federal agencies propose alternatives for comparison purposes that fall short of addressing recovery of Snake River fall chinook, spring/summer chinook, sockeye, and steelhead, it should be clear that those are not preferred alternatives.

2 Finally, the 1999 amendments to the Pacific Salmon Treaty have accomplished the goal set in the 1995 Proposed Recovery Plan of establishing a rebuilding program consistent with Pacific Salmon Commission objectives for the salmon stocks. The 1999 PST agreement provides certainty about how the northern fisheries will be operated in the future and reduces harvest impacts to levels that could not be achieved absent the agreement. The combined impact of reductions included in the 1999 PST agreement are far greater than that which could reasonably be achieved in U.S. fisheries alone. NMFS's biological opinion for the 1999 PST agreement issued in November 1999, recognizes this fact as one of the primary reasons for its finding of "no jeopardy." Now that the harvest goals of the 1995 Proposed Recovery Plan have been met for Snake River chinook, federal agencies must look for other means of addressing recovery of Snake River fish stocks.

As a signatory to the Pacific Salmon Treaty agreements, Alaska has been and will continue to do its part for Snake River salmon recovery.

I have enclosed specific comments from ADF&G staff.

Sincerely,

Frank Rue
Commissioner

Enclosure

Cc: Governor Tony Knowles
Alaska Delegation
SE Alaska Legislators

Alaska Department of Fish and Game

Comments on the All-H Paper Options and Alternatives

Harvest Options

Alaska has consistently done its part to conserve Snake River stocks. Alaska will continue to conserve these stocks over the next 10 years under the recently signed Pacific Salmon Treaty (PST) agreement. The best available science and historical background support the view that Alaska's fisheries should be managed according to the 1999 amendments to the PST and that no further harvest reductions should be considered for Alaskan fisheries.

The All-H Paper purports to be a conceptual recovery plan for salmon. In 1995, NMFS released a Proposed Recovery Plan for Snake River Salmon (NMFS, March 1995) for public review and comment. The provisions of the 1995 Proposed Recovery Plan concerning ocean harvest of Snake River fall chinook recognized that a rebuilding program consistent with Pacific Salmon Commission objectives provides, from a practical view, the best prospects for achieving reductions in ocean harvest. The 1995 Proposed Recovery Plan acknowledged that harvest reductions could only be achieved with the cooperative involvement of Canada because historically the majority of the ocean harvest of fall chinook occurred in Canadian waters (See 1995 Proposed Recovery Plan at pp. V-3-13 and 14). Similarly, many of the more recently listed chinook are also highly vulnerable to Canadian fisheries. The 1999 Pacific Salmon Treaty agreement has fulfilled the 1995 Proposed Recovery Plan goal of establishing such a rebuilding program.

The description of the PST found in Harvest Annex C should be expanded and included in the body of the document. The document should clarify for readers what the PST role is with regard to harvest management and explain that of the four Hs, the harvest sector is already playing a significant role in terms of recovery of listed salmon.

It is unclear exactly what federal agencies are proposing with regard to Alaska harvest. Harvest Options 1 and 2, included within Integrated Alternatives A and C, call for implementation of the 1999 PST agreement for Alaskan and Canadian fisheries. However, Option 3, included within Integrated Alternatives B and D, refers to additional "voluntary" reductions in Alaskan and Canadian fisheries. In addition, ocean harvest reductions of 15, 50 and 75 percent are mentioned in the evaluation of harvest options and discussed in the harvest appendix.

3 To the extent federal agencies are proposing that the integrated alternatives should implement the 1999 PST agreement, ADF&G agrees. If, however, the federal agencies are proposing further restrictions on Alaska's harvest under the guise of "voluntary" reductions, ADF&G strongly objects. Such reductions would be unwarranted and unauthorized under the PST agreement. Consideration of such reductions might well upset the delicate balance between U.S. and Canadian interests that has been achieved through years of difficult negotiations.

As the Chairman of the Council on Environmental Quality, George Frampton stated in testimony before the Senate Committee on Environment and Public Works (June 1999), "Are we prepared to address the issue of harvest? I am heartened to report to you that the answer is yes, if we implement the necessary agreements under the Salmon Treaty now before you." Those agreements have been implemented. The harvest part of the equation for recovery of Columbia and Snake River salmon is being addressed through rigorous controls that are already in place.

Habitat Section

4 It is obvious to everyone now that habitat restoration is a key component of any recovery strategy. Unfortunately, the habitat options mentioned in the All-H Paper are fairly vague and preclude detailed comment or analysis. The proposed actions to improve land habitat, water quality and quantity, and reduce predation are unspecified and, therefore, not evaluated. While ADF&G agrees that cooperation and coordination are vital components to achieve habitat restoration and that habitat restoration plays a vital role in recovery of these stocks, this document does not adequately describe what tangible results are being sought – i.e., lower water temperature, specific water quality improvements, areas identified habitat restoration and/or land

management changes needed to improve habitat. A final document should identify specific habitat measures that would be biologically beneficial for the listed Snake River fish.

4 cont. Furthermore, ADF&G believes that enforcing the existing laws (Clean Water Act and Endangered Species Act) should be the status quo not the most aggressive action considered (option 3). If more federal oversight, enforcement, and funding are needed then that should be specified in the document.

Hydro Section

5 The federal agencies should focus on alternatives to recover Snake River stocks by including a discussion of Hells Canyon and other upstream development. The Federal Energy Regulatory Commission (FERC) reauthorization of the Hells Canyon dam could have great effects on Snake River fall chinook by providing passage beyond Hells Canyon. This paper should go further than just recognizing that changes in FERC licensed projects may have benefits for listed fish. Possible benefits, from measures such as requiring fish passage, should be considered within the All-H analysis of options as well as during relicensing.

6 Furthermore, it is not clear why the breaching option does not include increased mitigation measures at the four Columbia River dams to assist with juvenile and adult fish passage. For example, since the listing of Snake River fall chinook harvest as a percentage of the total run has decreased (1988-92 about 58 percent of run harvested, 1993-97 about 36 percent of run harvested), while the percentage of returning adult fish associated with dam loss has increased (1988-92 about 28 percent lost, 1993-97 about 32 percent lost). The reasons for this increased adult non-harvest mortality and solutions to the problem should be identified. The potential benefits from drawdown of John Day Dam should also be considered.

Hatchery Options

7 Many, if not all, salmon hatcheries in the Columbia River Basin were instituted as mitigation measures for dam construction and operation. These programs were initiated in recognition that the dams were severely impacting the economies and lifestyles of a large number of people living in the Columbia River Basin, including the Palmer-Stevens Treaty Tribes and the coastal

fishing communities from the Oregon Coast to Southeast Alaska. Many of these mitigation hatcheries by necessity had to be large in order to produce the equivalent number of fish lost to the dams. The hatchery production from the Columbia River provides an important component of the shared harvest for the Pacific Salmon Treaty Agreement.

Strays into a local area from hatcheries that are using a locally adapted stock do not constitute a threat to the local stocks. In fact, hatcheries that use local area fish can be used for supplementation programs. However, we recognize the importance of reducing or eliminating strays from distant stocks. The degree that barging contributes to straying should be studied and appropriate measures taken if it is shown that barging fish contributes to this type of straying.

7 cont.

We support the use of good hatchery practices. The use of appropriate numbers of broodstock from local stocks and maintaining disease- free premises for raising the fish is mandatory. Good hatchery practices, however, also include: identifying specific objectives such as the number of adults caught in a specific fishery or the total number of adults returning, not only the number of fish released; identifying the production by applying coded-wire-tags (CWT) to a statistically significant portion of the release; analyzing the CWT data with respect to the objectives of the program and to determine the effect of specific fish culture practices, such as size of fish at release and time of release on the number of returning adults. Finally, hatchery programs need continual modification related to information gathered from evaluation in order to most efficiently meet their goals.

Integrated Alternatives

Of the four integrated alternatives presented, only A and D provide information indicating a reasonable likelihood of resulting in recovery for the various listed Snake River fish. Both of these alternatives involve breaching the dams, an action that, according to PATH and CRI analysis, is a necessary but perhaps not sufficient step in full recovery of these stocks. ADF&G will only support alternatives that have a high likelihood of recovery for Snake River fall chinook, spring/summer chinook, sockeye, and steelhead. Such an alternative would include removal of the earthen portions of the four Lower Snake River dams, additional habitat restoration, technological improvements at remaining dams, and water flow augmentation.

- Alternative A – Dam Removal: This alternative should be expanded to include habitat restoration and improving survival of juveniles and returning adult salmon at the Columbia River dams through hydro improvements, habitat restoration, and improved spill and water flow.

7 cont.

- Alternative B – Harvest Constraints: As discussed above, this alternative is not biologically sound because it does not result in a high likelihood of recovery for all listed Snake River fish. According to federal models (PATH and CRI) this alternative will not recover fall chinook or steelhead, and will do nothing to improve the survival of spring/summer chinook or sockeye. The federal agencies must be more specific in a discussion of harvest restriction and enumerate what each will accomplish for all listed Snake River stocks. Based on the science to date, Alternative B would not be a preferred alternative.

- Alternative C – Aggressive Non-Breach: This alternative brings us back to 1995 when federal agencies delayed any major hydro decisions in order to more fully study the issues. Federal agencies have just complete five years and spent $20 million on gathering additional scientific information. It is now time for the federal agencies to move forward with a recovery plan for Snake River fish stocks. This alternative will not result in recovery and would not be a preferred alternative.

- Alternative D – Maximum Protections: The federal agencies' own analysis does not support this "share the pain" alternative as necessary to recover Snake River stocks.